

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Federal-State Joint Board)
on Universal Service)

CC Docket No. 96-45

REPLY OF THE
NATIONAL EMERGENCY NUMBER ASSOCIATION

The National Emergency Number Association ("NENA") hereby replies to the comments of others in the captioned proceeding. In Comments dated April 11, 1996, NENA urged the Joint Board and Commission to include access to 9-1-1, enhanced 9-1-1 ("E9-1-1") and "touch tone" (dual tone multifrequency, or DTMF) signaling among the core services to be supported by universal service funds ("USF").

NENA is gratified that most commenters endorse the inclusion of these services, and acknowledges the sensible caveat that they should only be USF-covered where state or local authorities have approved 9-1-1 and/or E9-1-1 systems in the first place. But that approval is not an isolated act. The availability of USF may tip the balance in favor of implementing emergency number systems where, in the past, financing may have been in doubt for carriers and/or Public Safety Answering Points ("PSAPs").

The Georgia Public Service Commission suggests (Comments, 7) that access to emergency services "is a State matter which should be delegated to the states." Congress has ordered the FCC, assisted by the states through

a Joint Board, to determine USF-eligible services that are “essential to public safety.” To this extent, the choice of 9-1-1 and E9-1-1 as core services becomes a matter of national concern. But the new legislation does not alter the primary state/local initiatives and operational responsibility for emergency number calling. Only where local authorities have approved or placed in operation 9-1-1 or E9-1-1 systems are carriers required to provide access in order to be eligible for USF support. However, as indicated above, the availability of such support may become a factor in local decision-making.

GTE recommends (Comments, 2, n.6) that “only the ability to access a 911 or E911 bureau” -- by which it appears to exclude “non-network costs” -- should be included in the core definition of USF-eligible services. Enhancements of emergency calling systems, of course, are functions of software and terminal equipment as well as basic network transmission. We believe any costs incurred by carriers in providing E9-1-1 access, including for example the database creation and maintenance essential to ANI, ALI and selective routing, should be eligible for USF funding -- so long as this does not represent double recovery of costs already contained in tariffed or non-tariffed carrier charges.¹

Concerning the suggestion for “use of standard N11 numbers for providing citizen access to government information and services” (Comments, Texas Department of Information Resources, 3-4), NENA is on record in another proceeding cautioning against dilution and consumer confusion of the 9-1-1 emergency number by multiple assignments of

¹ See, Reply Comments, Texas Advisory Commission on State Emergency Communications, 2-3.

abbreviated dialing to reach other governmental functions.² It is not at all clear that these other governmental functions are as much in need of speed dialing as is emergency calling. In any event, the issues of number assignment are (1) pending in other dockets and (2) not explicitly a subject of USF, and ought not be considered here.

Respectfully submitted,

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By 

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² Reply Comments. IAD File No. 94-101 (now part of CC Docket 92-105), September 23, 1994.

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of May, 1996 a copy of the foregoing REPLY OF THE NATIONAL EMERGENCY NUMBER ASSOCIATION was served via regular first class mail upon all members of the Federal-State Joint Board and upon the following recipients:

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